

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Comissions's	)	
Amateur Radio Service Rules to Eliminate	)	RM-10786
Morse Code Proficiency Testing Requirements	)	
For All Classes of Amateur Licenses	)	
	)	
To: The Commission	)	

Comments of Darius Rad

I am writing to express my full support of the above noted Petition for Rule-making, seeking the expeditious elimination of the remaining Morse code proficiency test requirement from the Commission's Part 97 rules for all classes of amateur licenses issued by the Commission.

There was a time when Morse code was the only means of radio communication. However, radio communication technology has progressed considerably from that time, and Morse code has been superseded by many other more effective modes of radio communication. The use of Morse code for radio communication has been all but forgotten except for a number of amateur operators who pursue the use of Morse code for nostalgia and recreational purposes. Morse code is not necessary for effective emergency communication or any other type of communication.



One of the Commission's mandates states that the Amateur Radio Service exists to advance the art of radio communication. Regarding Morse code, presently the only way to adhere to that mandate is to remove the Morse code proficiency requirement from licensing. Demonstrating Morse code proficiency is no longer necessary or useful for an Amateur Radio operator. The IARU (International Amateur Radio Union) recognizes this. So do the administrations of many nations that have already removed the Morse code proficiency requirement from their own Amateur Radio service, including Switzerland, the United Kingdom, Belgium, Germany, the Netherlands, Norway, and other administrations are expected to rapidly follow suit. Additionally, it is not in the public interest to keep the Morse code proficiency requirement because it is an artificial barrier to entry for obtaining an Amateur Radio license which. This artificial barrier unnecessarily limits the pool of operators available for emergency communications.

The Commission's determinations, as well as a significant body of public comment, as referenced in the Petition, clearly demonstrate that a Morse code proficiency test requirement is unnecessary and undesirable, in that:

- It does not suit the basis and purpose of the Amateur Radio Service,
- It acts as a barrier to entry or advancement to otherwise qualified persons,
- It is not necessarily indicative of an individual's ability to contribute to the advancement of the radio art,
- It does not provide any indication of the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules,



- It no longer continues to serve a regulatory purpose, and
- It otherwise does not serve the public interest and necessity.

When the Commission recently comprehensively reviewed its Part 97 Amateur Radio regulations (WT Docket No. 98-143), the only reason cited for maintaining a Morse code proficiency test requirement was to satisfy ITU regulations. At that time, the Morse code requirement was reduced to the “minimum requirement that meets the ITU Radio Regulations”. Currently, that minimum requirement is *no Morse code test at all*.

I urge the Commission to act swiftly on this matter, and not to combine this request for rulemaking with other substantially unrelated issues. The issue of the Morse code requirement has been thoroughly reviewed quite recently, and there is no need to repeat that entire process again. The Commission has the authority to act without formal notice and public comment, as the issue of the Morse code test will only be eliminating requirements for licensing. No additional requirement would be imposed, and no party or other person would be prejudiced by the Commission's action in this matter.

Regarding my personal perspective on this matter, I am electrical engineer by trade. I hold a Master's Degree in Electrical and Computer Engineering from Carnegie Mellon University. Beyond my academic studies and employment, I am an electronics hobbyist. For many years I have been interested in radio communication, especially Amateur Radio. I have been studying the Commission's regulations and radio theory with the intent to obtain an Amateur Radio license. The only reason that I have not yet obtained a license is the Morse code requirement.



I do realize that I can obtain a Technician license without a Morse code test under the current regulations. However, I have declined to do so for two reasons. First, I am interested in using privileges only afforded higher class licenses, specifically the lower frequency bands. Second, I am quite adequately prepared to pass the Advanced and Amateur Extra written exams, and I feel that I would be unnecessarily restricted in my amateur radio communication endeavors if I were to forgo the higher class licenses. I have been watching the issue of the Morse code test requirement with great interest for a few years. As soon as the Commission removes the Morse code test requirement, I will immediately take the examinations for licensing – which I feel confident that I will pass – and be able to contribute my skill and expertise to the advancement of the radio art.

In summary, I urge the Commission to accept the Policy for Rulemaking, seeking the expeditious elimination of the remaining Morse code proficiency test requirement for the Amateur Radio service. The Morse code requirement is no longer necessary or desirable. Additionally, I ask the Commission to act swiftly on this matter, as it is substantially independent from other policy decisions, and would be a wise and prudent decision.

Respectfully Submitted,

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